NORLITE CORPORATION

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October 18, 2012

Karen M. Gaidasz, CPESC
Environmental Analyst
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report
Kiln 1: 10/08/12 – 10/17/12
Kiln 2: 10/08/12 – 10/17/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 10/08/12 thru 10/17/12. The attached document explains each of the "malfunctions" for Kilns One & Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. Norlite conducted several inspections of the scrubber system and stack gas probe to try to explain the stack gas flow cutoffs which occurred. Norlite did find that damage had occurred to the Mist Pad of Kiln One which was corrected. Norlite is planning further investigation for Kiln 2 to try to resolve the rear chamber system and stack gas cutoffs. Norlite does believe the unusually high amount of problems with power delivery to the kilns caused many of the problems with the scrubber systems for both kilns. Also, Norlite has been making progress with the vendor of the new stack gas measurement technology to determine if this technology can be used at Norlite. As stated previously, Norlite and its consultant believe the stack gas cutoffs which are less than 2 minutes in duration to be associated with water droplets hitting the probe.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

DCL: 2410

Norlite Corporation

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments
ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments
Tita LaGrimas, Tradebe

DCL: 2410

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
10/08/12 - 10/17/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
10/11/2012	3:57:50	10/11/2012	3:58:17	0:00:27	145	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/11/2012	21:33:12	10/11/2012	21:33:31	0:00:19	146	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/11/2012	21:43:09	10/11/2012	21:43:26	0:00:17	147	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/11/2012	22:57:38	10/11/2012	22:58:00	0:00:22	148	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/11/2012	23:19:05	10/11/2012	23:19:22	0:00:17	149	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/11/2012	23:25:02	10/11/2012	23:25:19	0:00:17	150	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/12/2012	3:49:25	10/12/2012	3:49:58	0:00:33	151	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/12/2012	12:10:23	10/12/2012	13:06:11	0:55:48	152	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
10/08/12 - 10/17/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
10/12/2012	13:08:39	10/12/2012	13:09:02	0:00:23	153	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12
10/13/2012	6:43:29	10/13/2012	6:44:29	0:01:00	154	Malfunction	A Large Aggregate Ball Caused the Front Hood Doors to Open Which Caused A Momentary Reduction In Differential Pressure at the Front End.	Front Kiln Pressure, 1 Second Delay	Opl	Removed The Large Aggregate Ball From the Cooler Door
10/15/2012	4:57:38	10/15/2012	4:58:20	0:00:42	155	Malfunction	Recent Power Delivery Problems Caused Several Scrubber Issues. Kiln 1 Was Shutdown on 10/17/12 to Conduct More Scrubber and Baghouse Maintenance. The Issues Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Kiln Shutdown on 10/17/12

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
10/08/12 - 10/17/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
10/9/2012	0:02:20	10/9/2012	0:04:24	0:02:04	339	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/9/2012	2:52:59	10/9/2012	2:53:38	0:00:39	340	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow with Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge Triggering the Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow		Adjusted Fuel Flow
10/9/2012	3:13:33	10/9/2012	3:14:06	0:00:33	341	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/9/2012	3:14:11	10/9/2012	3:14:42	0:00:31	342	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/9/2012	4:34:38	10/9/2012	4:35:02	0:00:24	343	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/9/2012	11:58:05	10/9/2012	11:58:43	0:00:38	344	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/10/2012	0:32:14	10/10/2012	0:32:43	0:00:29	345	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/10/2012	15:05:15	10/10/2012	15:05:54	0:00:39	346	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow

10/10/2012	20:34:17	10/10/2012	20:39:19	0:05:02	347	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow with Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge Triggering the Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
10/14/2012	18:04:54	10/14/2012	18:05:42	0:00:48	348	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/16/2012	12:54:12	10/16/2012	12:54:42	0:00:30	349	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow